

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: JOHNNY CRUZ,	:	
	:	CHAPTER 7
	:	NO.: 22-10523(MDC)
Debtor.	:	
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**DEBTORS' RESPONSE THE CHAPTER 13 TRUSTEE'S MOTION FOR DISMISSAL**

The Debtor, Johnny Cruz hereinafter referred to as the "Debtor," by and through his counsel, Center City Law Offices, LLC, hereby respectfully files her response to the Chapter 13 Trustee's Motion for Dismissal. For the reasons more fully set forth below, the Debtor submits that there is no basis for the Trustee's Motion.

1. The Debtor's pay advices have been filed on the docket in time for the Section 341 Meeting to be held on May 11, 2022.
2. The Debtor was in an active Chapter 7 on March 12, 2022, the day the Trustee claims the Debtor's pay advices.
3. The Court had not yet approved the Debtor's Motion to Convert on March 12, 2022.
4. The Order granting Debtor's Motion To Covert was entered on April 4, 2022.

5. Debtor's counsel mistakenly believed all of Debtor's documents had been filed in the converted chapter 7.

WHEREFORE, the Debtor, Johnny Cruz, respectfully prays this Honorable Court deny any and all relief requested presently by the Motion of the Trustee.

Respectfully submitted,

*CENTER CITY LAW OFFICES, LLC*

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